

EXHIBIT 25

Vivian Chew Keller

From: Beth R. Young <bry@lnbyg.com>
Sent: Thursday, June 20, 2024 1:26 PM
To: Katie Prescott
Subject: Re: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Yes, the Assignee does have the source codes.

BETH ANN R. YOUNG, Esq.

LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
2818 La Cienega Avenue
Los Angeles, CA 90034
Direct: (310) 229-3352
Mobile: (310) 409-6708
bry@lnbyg.com

On Jun 20, 2024, at 10:19 AM, Katie Prescott <prescott@fr.com> wrote:

Hi Beth,

I look forward to speaking further this afternoon. We understand that ItsOn ABC is on track for a production by July 26, 2024. In the interim, we request that ItsOn ABC immediately confirm whether it still maintains possession of the ItsOn Inc. source code? We've learned that Brian Murphy at Sherwood Partners stated as much by email and via phone to counsel for Headwater (Russ, August, & Kabat) in January/February 2023, and request that you provide us that important information while we await the production.

Regards,
Katie

Katherine D Prescott

Principal ■ Fish & Richardson P.C.

T: 650 839 5180 | prescott@fr.com | [Bio](#)

From: Katie Prescott
Sent: Tuesday, June 18, 2024 10:46 AM
To: Beth R. Young <bry@lnbyg.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Hi Beth –

Thank you for the update. Let's plan on August 13 for the deposition. Hopefully we'll be able to conduct the deposition by zoom, but we will confirm that once we receive the document production.

Best regards,
Katie

Katherine D Prescott

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From: Beth R. Young <bry@lnbyg.com>
Sent: Tuesday, June 18, 2024 10:25 AM
To: Katie Prescott <prescott@fr.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Hi Katie.

I just wanted to follow up with you on the status of the Assignee's document retrieval and related issues. I will hope to know more at the end of the week, but I believe that we will be on track for a production by July 26, 2024. I have been advised that the data room was closed but the Assignee is seeing about whether it can be resurrected and I should know more about that by the end of the week too.

For planning purposes, I have confirmed with Mr. Murphy that of the dates we discussed for his deposition, he is available on August 5, 6, 13 or 14, but I have a court appearance on August 6 at 10:00 am that may run a few hours, so I'm hopeful that one of the other dates will work for everyone or we can start after 1:00 pm PST, and that we can conduct the deposition on zoom. Please let me know the date and we can get that on calendar.

Thanks so much, and best regards,

Beth

BETH ANN R. YOUNG, Esq.

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Sent: Thursday, June 13, 2024 3:43 PM
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Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Good talking to you Katie.

This will confirm that we will talk further on Thursday, June 20, 2024 at 3:00 pm and hopefully by then the Assignee and I will have a better understanding of the documents that the Assignee has available for review and production and the estimating timing for that to take place. The goal will be for a document production by July 26, 2024, if possible.

I will ask Mr. Murphy for dates upon which he is available for deposition as a representative of the Assignee, between August 5 – 14, 2024. Our request is that this deposition will take place via zoom, but I understand you need to consider this in the context of the document production. Hopefully we can work this out.

Finally, as to the subpoenas to Mr. Murphy individually and Sherwood Partners, as I explained in our call, the holder of the documents and assets of Itson that existed prior to the General Assignment is Itson ABC. Sherwood only assists in setting up the single purpose entity at the time of the General Assignment, and Mr. Murphy is an agent of the Assignee, Itson. Neither Sherwood nor Mr. Murphy have any records, all of which are within the custody and control of the Assignee (even though they use a Sherwood email address). All emails relating to the Itson General Assignment are in the Assignee's custody and control and there is nothing additional that either Mr. Murphy or Sherwood could produce. If you need further clarification in a formal written response we can provide that, and it would say essentially this.

Please let me know if you have any questions or if I have misstated anything we discussed.

Best regards,

Beth

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From: Katie Prescott <prescott@fr.com>
Sent: Wednesday, June 12, 2024 3:40 PM
To: Beth R. Young <bry@lnbyg.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Beth – I'll send an invite for 3pm tomorrow. I have a hard stop at 3:25, but that should be plenty of time for this initial call.

Katherine D Prescott

Principal ■ Fish & Richardson P.C.

T: 650 839 5180 | prescott@fr.com | [Bio](#)

From: Beth R. Young <bry@lnbyg.com>
Sent: Wednesday, June 12, 2024 3:37 PM
To: Katie Prescott <prescott@fr.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Hi Katie.

Thanks for the quick response! I have multiple calls tomorrow starting at 9:00 am PST that go through about 3:00 pm, but I would be available after 3:00 pm if there is a time that works for you. I'm in court most of Friday so it will be hard to schedule a call, but I am available on Monday before 3:00 pm if there is a time that works for you. Please let me know.

BETH ANN R. YOUNG, Esq.

LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.

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To: Beth R. Young <bry@lnbyg.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Beth - Thank you for reaching out. Do you have time to speak tomorrow before 10am PT?

Katherine D Prescott

Principal ■ Fish & Richardson P.C.

T: 650 839 5180 | prescott@fr.com | [Bio](#)

From: Beth R. Young <bry@lnbyg.com>
Sent: Wednesday, June 12, 2024 1:47 PM
To: Katie Prescott <prescott@fr.com>

Cc: Jason Wietholter <jwietholter@raklaw.com>

Subject: Headwater v. Samsung

[This email originated outside of F&R.]

Dear Ms. Prescott:

I just left you a voice message at your office. I represent Itson ABC in connection with the multiple subpoenas your office has served, two to Itson ABC, and now two more to Bernie Murphy in his individual capacity. The Assignee is presently reviewing its records to gather and determine if it has responsive documents and then properly bates stamp and produce them. Because this assignment estate closed many years ago, and the individuals primarily working on the matter are no longer available, it is going to take a little time to complete the process of gathering and reviewing documents. Accordingly, the Assignee will need more time than provided in the subpoena for both production and deposition. Mr. Murphy does not have any documents in his individual capacity, and any responsive documents will be provided by the Assignee in its production.

Please let me know when you are available to discuss extended dates for the production of documents and scheduling a deposition.

Thank you.

Beth Young

BETH ANN R. YOUNG, Esq.

LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.

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Vivian Chew Keller

EXHIBIT 08

08/13/24

From: Beth R. Young <bry@lnbyg.com>
Sent: Monday, July 15, 2024 9:00 PM
To: Katie Prescott; jwietholter@raklaw.com
Cc: Kyle Fleming
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Hi Katie.

The Assignee is still looking for the source codes and we hope to confirm that information this week. The Assignee did not receive emails from Itson at the time of the ABC.

BETH ANN R. YOUNG, Esq.

LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.

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From: Katie Prescott <prescott@fr.com>
Sent: Monday, July 15, 2024 5:35 PM
To: jwietholter@raklaw.com
Cc: Beth R. Young <bry@lnbyg.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Beth,

Thank you for your email earlier today confirming that you have sent a “link of the Assignee’s documents to Mr. Wietholter for Headwater to review for any potential privilege issues” and that you think ItsOn ABC LLC will be able to make its production on July 26. In the interim, can you address my questions below:

- **Source Code:** Am I correct in understanding that ItsOn ABC LLC has in its possession a password-protected folder of ItsOn Inc. source code, but that source code is currently inaccessible because ItsOn ABC LLC lacks the necessary password(s)? If so, please advise on your efforts to obtain the necessary password(s).
- **Email:** Am I correct in understanding that ItsOn ABC LLC is not in possession of ItsOn Inc. email. Did ItsOn ABC LLC ever receive ItsOn Inc. email from ItsOn Inc. or otherwise? If so, when did ItsOn ABC LLC stop keeping the ItsOn Inc. email?

Thank you,
Katie

Katherine D Prescott

Principal ■ Fish & Richardson P.C.

T: 650 839 5180 | prescott@fr.com | [Bio](#)

From: Jason Wietholter <jwietholter@raklaw.com>
Sent: Monday, July 15, 2024 12:19 PM
To: Katie Prescott <prescott@fr.com>
Cc: Beth R. Young <bry@lnbyg.com>; Kyle Fleming <kfleming@fr.com>
Subject: Re: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Katie,

Headwater was not involved in the transition of assets to ItsOn ABC, LLC. Even so, we reached out to Headwater employees (including Dr. Raleigh), and they do not possess passwords for ItsOn ABC LLC source code.

Further, we have reached out to Mr. Lavine. As you're aware from his deposition, he was involved in the process of transitioning the assets to ItsOn ABC, LLC. Mr. Lavine confirmed that when Sherwood/ItsOn ABC, LLC obtained the ItsOn assets, Mr. Lavine provided instructions on how to access the material, including the passwords. Mr. Lavine does not possess those instructions/passwords.

Regards,

Jason Wietholter

Russ, August & Kabat

12424 Wilshire Boulevard, 12th Floor | Los Angeles, California 90025
Main +1 310 826 7474 | jwietholter@raklaw.com | www.raklaw.com

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On Jul 9, 2024, at 3:12 PM, Katie Prescott <prescott@fr.com> wrote:

Beth – Thank you for the productive discussion yesterday concerning ItsOn ABC LLC's document collection efforts. From our discussion, I understand that:

- ItsOn ABC LLC has in its possession a password-protected folder of ItsOn Inc. source code, but that source code is currently inaccessible because ItsOn ABC LLC lacks the necessary password(s). Is my understanding correct? If so, please advise on your efforts to obtain the necessary password(s).
- ItsOn ABC LLC is not in possession of ItsOn Inc. email. Is my understanding correct? Did ItsOn ABC LLC ever receive ItsOn Inc. email from ItsOn Inc.? If so, when did ItsOn ABC LLC stop keeping the ItsOn Inc. email?

Jason – Please advise on the efforts that Headwater or other parties represented by RAK, including Dr. Raleigh and Mr. Lavine, have made to provide ItsOn ABC LLC with the password(s) necessary to access the ItsOn Inc. source code.

Regards,
Katie

Katherine D Prescott

Principal ■ Fish & Richardson P.C.

T: 650 839 5180 | prescott@fr.com | [Bio](#)

From: Katie Prescott
Sent: Friday, July 5, 2024 8:13 AM
To: Beth R. Young <bry@lnbyg.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Terrific, I will circulate a dial-in shortly.

Katherine D Prescott

Principal ■ Fish & Richardson P.C.

T: 650 839 5180 | prescott@fr.com | [Bio](#)

From: Beth R. Young <bry@lnbyg.com>
Sent: Friday, July 5, 2024 11:11 AM
To: Katie Prescott <prescott@fr.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

I have a call in your window on Tuesday, but how is Monday at 11:00 am?

BETH ANN R. YOUNG, Esq.

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From: Katie Prescott <prescott@fr.com>
Sent: Friday, July 5, 2024 11:05 AM
To: Beth R. Young <bry@lnbyg.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Beth,

I hope you had a wonderful Fourth of July. Is there a convenient time early next week when we could connect to discuss the status of your collection efforts and whether there is anything we can do to facilitate production? I am generally available on Monday. On Tuesday, I can be available at 9-10am and 11:30-1.

Best regards,
Katie

Katherine D Prescott
Principal ■ Fish & Richardson P.C.

T: 650 839 5180 | prescott@fr.com | [Bio](#)

From: Katie Prescott
Sent: Friday, June 21, 2024 9:08 AM
To: Beth R. Young <bry@lnbyg.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Hi Beth,

Following up on yesterday's conversation, attached please find a copy of the protective order in this matter. If you do a search on "SOURCE CODE" you can find the provisions applicable to source code. Section 10 (pp. 8-13) provides the bulk of the information.

All the best,
Katie

Katherine D Prescott
Principal ■ Fish & Richardson P.C.

T: 650 839 5180 | prescott@fr.com | [Bio](#)

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Sent: Tuesday, June 18, 2024 10:46 AM
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Hi Beth –

Thank you for the update. Let's plan on August 13 for the deposition. Hopefully we'll be able to conduct the deposition by zoom, but we will confirm that once we receive the document production.

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Please let me know if you have any questions or if I have misstated anything we discussed.

Best regards,

Beth

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Katherine D Prescott
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To: Beth R. Young <bry@lnbyg.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>; Kyle Fleming <kfleming@fr.com>
Subject: RE: Headwater v. Samsung - ItsOn ABC, Bernie Murphy

Beth - Thank you for reaching out. Do you have time to speak tomorrow before 10am PT?

Katherine D Prescott
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To: Katie Prescott <prescott@fr.com>
Cc: Jason Wietholter <jwietholter@raklaw.com>
Subject: Headwater v. Samsung

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Dear Ms. Prescott:

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Please let me know when you are available to discuss extended dates for the production of documents and scheduling a deposition.

Thank you.

Beth Young

BETH ANN R. YOUNG, Esq.

LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.

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